

**WITNESS AND EXHIBIT LIST**  
**UNITED STATES BANKRUPTCY COURT**  
**SOUTHERN DISTRICT OF TEXAS**  
**HOUSTON DIVISION**

**U.S. Bankruptcy Judge: Alfredo R Perez**

<b>Main Case No:</b>	25-30155	
<b>Name of Debtor:</b>	Alliance Farm & Ranch, LLC, <i>et al.</i>	
<b>Adversary Case No:</b>		
<b>Style of Adversary:</b>		
<b>Does this amend or supplement a previously filed Witness &amp; Exhibit List? If so, state the date and CM/ECF No. of such previous filing.</b>	<b>Yes</b>	<b>No</b>
		X
	<b>Date</b>	<b>CM/ECF No.</b>
<b>Hearing/Trial Date:</b>	May 20, 2025	
<b>Hearing Time:</b>	10:00 AM	
<b>Party's Name:</b>	Dustin Etter	
<b>Attorney's Name:</b>	Heather Heath McIntyre	
<b>Attorney's Phone:</b>	(713) 590-4200	
<b>Nature of Proceeding(s):</b>	<b>CM/ECF No.</b>	<b>Matter</b>
	26	Application to Employ Okin Adams Bartlett Curry, LLP as General Counsel
	31	Application to Employ Deborah L. Crain and E-Merger Law, PLLC as Special Counsel
	68	Emergency Motion to Convert Case from Chapter 11 to Chapter 7

**WITNESS LIST**

<b>Lay Witnesses:</b>	Dustin Etter
	Jarod Furr
	Noah Meek
	Any witness called or designated by another party
<b>Expert Witnesses:</b>	Any witness called or designated by another party

**REBUTTAL/ IMPEACHMENT WITNESSES**

<b>Lay Witnesses:</b>	Any witness called or designated by another party
<b>Expert Witnesses:</b>	Any witness called or designated by another party

Ex. No.	DESCRIPTION	FOR COURT USE ONLY		
		OFFERED	OBJECTION	DISPOSITION
1.	Emergency Motion to Convert Chapter 11 Cases to Chapter 7 [Dkt No. 68]			
2.	Contribution Agreement [Dkt No. 68-1]			
3.	AEP Truist Bank Statements April - June 2022 [Dkt No. 68-2]			
4.	AEP Vendor Quick Report for Eric Ostrander [Dkt No. 68-3]			
5.	June 2022 ACH Ledger [Dkt No. 68-4]			
6.	November & December 2022 ACH Ledger [Dkt No. 68-5]			
7.	TX Franchise Report - J Parker Construction LLC [Dkt No. 68-6]			
8.	April - December 2022 ACH Ledger [Dkt No. 68-7]			
9.	Ranch Real Estate Lien Note [Dkt No. 76]			
10.	List of Equity Security Holders [Dkt No. 35]			
11.	Plaintiff's Eighth Amended Petition [Claim No. 2-1, Part 2]			
12.	Deed of Trust [Dkt No. 37-2]			
13.	Farm & Ranch Contract – Ostrander & Milner [Dkt No. 37-6]			
14.	Order Denying Emergency Motion to Dismiss and Granting Emergency Motion for Joint Administration [Dkt No. 54]			
15.	Hearing Transcript [Dkt No. 44-5]			
16.	Defendants' Answers to Plaintiff's Second Set of Interrogatories [Dkt No. 44-6]			
17.	Farm & Ranch Contract – Ostrander & AEP [Dkt No. 56-2]			
18.	Receipts and Disbursements Ledger [Dkt No. 56-3]			
19.	Ranch Contract Amendment [Dkt No. 56-5]			
20.	Remodel Invoices [Dkt No. 56-10]			
21.	Commercial Lease Agreement [Dkt No. 56-12]			
22.	Etter's Emergency Motion to Reschedule [Dkt No. 64]			
23.	Notice of Lis Pendens			
24.	Emergency Motion to Expunge Notice of Lis Pendens			
25.	Notice of Submission for Motion to Expunge Lis Pendens			
26.	Debtor AFR's Schedules Petition [Dkt No. 1]			
27.	Debtor AFR's Schedules A/B, D, E/F, G, and H (without SoFA) [Dkt No. 34]			
28.	Debtor AFR's Statement of Financial Affairs [Dkt No. 36]			
29.	Debtor AEP's Petition and Schedules A/B, D, E/F, G, and H (without SoFA) [Dkt No. 1, Case No. 25-31937]			

30.	Notice of Foreclosure Sale			
31.	Ranch Improvements Payment Totals			
32.	AEP American Express Bank Statements			
33.	Declaration of Noah Meek			
<b>REBUTTAL/IMPEACHMENT EXHIBITS</b>				
1.	Any and all exhibits listed or used by another other party			

Dustin Etter reserves any and all rights to amend or supplement this *Witness and Exhibit List*, to call any witnesses designated by any other party, and use any other exhibit designated by any other party to the hearing.

Dated: May 14, 2025.

Respectfully submitted,

/s/ Heather Heath McIntyre  
 Heather H. McIntyre TBN 24041076  
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**ATTORNEYS FOR DUSTIN ETTER**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been served on (i) all parties receiving ECF in the above-referenced case via ECF and (ii) parties listed below as indicated on May 14, 2025:

<u>Debtor:</u> Alliance Farm & Ranch, LLC c/o Timothy L. Wentworth Okin Adams Bartlett Curry, LLP 1113 Vine St., Suite 240 Houston, TX 77002 <i>VIA ECF</i>	<u>Debtor:</u> Alliance Energy Partners, LLC c/o Timothy L. Wentworth Okin Adams Bartlett Curry, LLP 1113 Vine St., Suite 240 Houston, TX 77002 <i>VIA ECF</i>
<u>Proposed General Counsel for Debtors:</u> Okin Adams Bartlett Curry, LLP c/o Timothy L. Wentworth 1113 Vine St., Suite 240 Houston, TX 77002 <i>VIA ECF</i>	<u>Proposed Special Counsel for Debtors:</u> Deborah L. Crain and E-Merger Law, PLLC c/o Deborah L. Crain 1334 Brittmoore Rd., Suite 2314 Houston, TX 77043 <i>VIA EMAIL: <a href="mailto:dcrain@lawla.com">dcrain@lawla.com</a></i>
<u>United States Trustee:</u> Office of the U.S. Trustee c/o Ha Minh Nguyen 515 Rusk St., Suite 3516 Houston, TX 77002 <i>VIA ECF &amp; EMAIL: <a href="mailto:ha.nguyen@usdoj.gov">ha.nguyen@usdoj.gov</a></i>	

*/s/ Heather Heath McIntyre*

Heather Heath McIntyre